

To: Clerk of Court

From: Lidya Maria Radin

RE: US v. RADIN, 16-cr-528

Date: 2/21/2017

(1) Please file the enclosed “ **DEFENDANT Lidya Radin’s REQUESTS FOR PRODUCTION OF DOCUMENTS AND/ OR THINGS, SET TWO (2)** ” with Certificate of Service.

(2) I do not file my papers through the Pro Se Office as Magistrate Debra Freeman’s August 17, 2016 Order was already found to be unlawful. I file my paperwork through the Clerk of Court’s office, not through the Pro Se Office. The Pro Se Staff attorneys and the staff ^{pe} that the Pro Se Office engage in the unauthorized practice of law, and I already caught them lying in my case(s). Accordingly, I will have nothing to do with them.

(3) Further, I understand that this Court uses the deceptive practice of putting the submissions of a Pro Se, Pro Per, Sui Juris litigant into the hands of a so-called “Pro Se Staff Attorney” who then provides the judge with a summary, often inaccurate and misconstrued, and that this Court does not inform the Pro Se, Sui Juris, Pro Per litigant that this is done. Thus, I demand that this is not done here. I demand that my submissions be given to a federal district judge, not a magistrate judge, directly without input from some nameless, faceless, so-called “Pro Se Staff Attorney” who engages in the unauthorized practice of law by purporting to represent me and/or my case, when, in fact, this individual never ascertained the facts from Me. The so-called “Pro Se Staff Attorney” does not represent me and/or my case. If the judge has a question, then, he/she can ask Me, and/or schedule a hearing, if needed. I demand that my submissions be given to a federal district judge directly, not to a magistrate judge, without passing through the hands of some nameless, faceless, so-called “Pro Se Staff Attorney” who does not represent me, and that my submissions are given to the presiding federal district judge directly, exactly as they were filed, without alteration, without being misconstrued in a summary.

Thank you.

Lidya Maria Radin, sui juris

Lidya Maria Radin, sui juris

U S DISTRICT COURT SDNY

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Respondent's Contact Information:

United States Attorney Preet Bharara and,
Assistant United States Attorney Stephanie Lindsay Lake
United States Dept. of Justice/ U.S. Attorney's Office
1 Saint Andrew's Plaza
New York, New York 10007-1701
Telephone: 212-637-2624

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

docket no: 16-cr-528 (HBP)

UNITED STATES OF AMERICA,

**DEFENDANT Lidya Radin's REQUESTS
FOR PRODUCTION OF DOCUMENTS
AND/ OR THINGS, SET TWO (2)**

Plaintiff,

v.

LIDYA MARIA RADIN

Defendant

PROPOUNDING PARTY: Lidya Maria Radin

**RESPONDING PARTY: U.S. Attorney Preet Bharara and his assistant, AUSA
Stephanie Lindsay Lake**

SET NUMBER: TWO (2)

To Plaintiff "UNITED STATES OF AMERICA" and to its attorneys of record, United States Attorney Preet Bharara and his assistant, Stephanie Lindsay Lake:

Defendant, Lidya Maria Radin, demands that you produce and permit the inspection and copying by or on behalf of Ms. Radin the documents and/or tangible things in the categories described below.

PLACE AND TIME OF PRODUCTION:

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U.S. DISTRICT COURT SDNY

Production is to be by production of the original documents and/or things for inspection and copying at:

UPS Store located at 14 Murray Street, New York, New York, 10007, located on Murray Street between Broadway and Church, telephone: 212-810-0834 on March 23, 2017.

If unable to produce documents and/or things on this date, please contact Ms. Radin before this date to set up a mutually agreeable time and date.

CATEGORY OF DOCUMENTS OR THINGS TO BE PRODUCED:

1. The personnel files of each agent of the U.S. Marshal Service who may be a witness, for information relevant to bias, previous reports of excessive use of force, or lack of honesty. These individuals include but are not limited to: Frank Pena, Sheri Robinson, James Howard, Shayne Doyle, Immanuel Mischa Wartofsky, Jerry Sanseverino, Juan Mattos, Jr., Paul Safier, Melissa Salcedo, and each Court Security officer/contract guard in every so-called security escort of Lidya Radin in any federal building including the Bankruptcy Court in the Eastern district of New York, the federal courthouse in the Eastern district of New York, the federal courthouse in the Southern district of New York, the federal courthouse in Newark, New Jersey, and the federal courthouse in Trenton, New Jersey.
2. The personnel files of each agent of the Department of Homeland Security and/or the Federal Protective Service who may be a witness, for information relevant to bias, previous reports of excessive use of force, or lack of honesty. These individuals include but are not limited to: Homeland Security Officer V. Samuel, Homeland Security Inspector Justine Green, Homeland Security Officer Sandrowsky, Homeland Security Officer/supervisor Barnes, Homeland Security Officer Will, Homeland Security Officer Wong, and the Homeland Security Officer(s) who are military veterans and refused to identify themselves on July 7, 2016 in the federal building located at 26 Federal Plaza, New York, New York, and who were in the company of Homeland Security Officer/supervisor Barnes, when Barnes was informed by Radin and her group that his men were out-of-control, had menaced, instilled fear, had pushed, and threatened members of Radin's group, had inflicted the crimes of false arrest and false imprisonment upon Radin, and after putting Radin in handcuffs, see statements of AUSA Stephanie Lindsay Lake, did not bring Radin immediately to a judge on July 7, 2016 in violation of the Federal Rules of Criminal Procedure, Rule 5, arrest without a warrant.
3. The personnel files of each government agent in connection with the crimes of false arrest and false imprisonment inflicted on Lidya Radin on January 28, 2016 and on July 7, 2016 for information relevant to bias, previous reports of excessive use of force, or lack of honesty including but not limited to those government agents and other

individuals whose identity and contact information are being deliberately concealed from Defendant Radin in violation of U.S. Attorney Preet Bharara's ongoing duty under Brady (Brady v. Maryland, 373 U.S. 83, 1963) by, for example, tampering with the building video tape(s) to conceal over an hour of video tape in connection with the crimes of false arrest and false imprisonment inflicted upon Lidya Radin on January 28, 2016 in the federal district courthouse located at 500 Pearl Street, New York, New York and in connection with ex-parte communications with Magistrate Peck on January 28, 2016.

4. All policies of the U.S. Marshal Service and its agents regarding the use of force.
5. All policies of the Department of Homeland Security and the Federal Protective Service and its agents regarding the use of force.
6. Un-redacted copies of Bates-stamped documents USAO_000213 to USAO_000218.
7. The letter(s) to U.S. Attorney Preet Bharara in connection with certified receipt tracking number: 7015 0640 0002 2514 7699 and Radin and members of Radin's group reaching out to the federal Grand Jury to report constitutional violations, and collection of an illegal debt, racketeering, see In the matter of In re Grand Jury application, 617 F.Supp. 199 (1985), as it is our duty to report.
8. All emails, texts, reports, and other communications from, to, and among agents of the U.S. Marshal's Service, and/or the Department of Homeland Security and/or the Federal Protective Service and/or the U.S. Attorney's Office and/or any other individual or individuals including but not limited to Frank Pena and Attorney Robert Perry in connection with the crimes of false arrest and false imprisonment that were inflicted upon Lidya Radin on January 28, 2016 in the federal district courthouse located at 500 Pearl Street, New York, New York.
9. All emails, text messages, reports and other communications from, to and among agents of the U.S. Marshal's Service and/or the Department of Homeland Security and/or the Federal Protective Service and/or contract court security guards and/or the U.S. Attorney's Office and/or Judge Pauley and/or Kyle O. Wood and/or any other individual or individuals during the proceedings in front of Judge Pauley on January 28, 2016 that mention Lidya Radin and/or Dean Loren as revealed by the transcript from January 28, 2016 wherein Judge Pauley revealed that Pauley knew who Loren was by referencing school board meetings.
10. All emails, texts, reports, and other communications from, to, and among agents of the U.S. Marshal's Service and/or the Department of Homeland Security and/or the Federal Protective Service and/or contract court security officers and/or the U.S. Attorney's Office and/or the Federal Bureau of Investigation (FBI) and/or the FBI Screening Center and/or any other individual or individuals on July 6, 2016 in connection with Jayson Harley Burg coming to the federal courthouse located at 500 Pearl Street, New York, New York, the next day on July 7, 2016, with Lidya Radin as text messages and other communications have already been disclosed by the Department of Justice that reveal bias against Burg.

11. All emails, texts, reports, and other communications from, to, and among agents of the U.S. Marshal's Service and/or the Department of Homeland Security and/or the Federal Protective Service and/or contract court security officers and/or the U.S. Attorney's Office and/or any other individual or individuals including but not limited to Magistrate Debra Freeman during the proceedings in front of Magistrate Freeman on July 7, 2016.
12. All emails, texts, reports, and other communications from, to, and among agents of the U.S. Marshal's Service and/or the Department of Homeland Security and/or the Federal Protective Service and/or contract court security officers and/or the U.S. Attorney's Office and/or any other individual or individuals including but not limited to Magistrate Debra Freeman, Shayne Doyle, Homeland Security Officer V. Samuel, a black man identifying himself as "Valez" in connection with the crimes of false arrest and false imprisonment that were inflicted upon Lidya Radin, on July 7, 2016 in the federal courthouse located at 500 Pearl Street, New York, New York.
13. All emails, texts, reports, and other communications from, to, and among agents of the U.S. Marshal's Service and/or the Department of Homeland Security and/or the Federal Protective Service and/or contract court security officers and/or the U.S. Attorney's Office and/or any other individual or individuals in connection with Homeland Security Officers Green, Samuel, Will, Wong, and Sandrowsky menacing, instilling fear, threatening members of Radin's group on July 7, 2016.
14. Any and all files, reports, communications, and the like in any form including all linked files and meta-data from the Federal Bureau of Investigation (FBI) including any and all information in any form in connection with the FBI Terrorist Screening Center including profiling information that was and is used to target Lidya Radin.
15. Any and all files, reports, communications and the like in any form including all linked files and meta data in connection with Antoinette Woolridge in the criminal division of the U.S. Attorney's Office in the Eastern district of New York, Department of Justice, in connection with Radin's complaints about Yeshiva University and its medical school, the Albert Einstein College of Medicine of Yeshiva University, and federal student loan fraud and hate crimes against Radin and fabricated rulings by federal Judge Robert P. Patterson Jr. including text messages, telephone calls, emails, reports, security assessments and the like.
16. Any and all files, reports, communications and the like in any form including all linked files and meta data in connection with Antoinette Woolridge in the criminal division of the U.S. Attorney's Office in the Eastern district of New York, Department of Justice, in connection with Radin receiving death threats and the New York Police Department and the Brooklyn District Attorney's office failure and refusal to protect Radin's life including text messages, telephone calls, emails, reports, security assessments and the like.
17. Any and all files, reports, communications and the like in any form including all linked files and meta data in connection with Shayne Doyle and Judge A. Ross and any other

individual or individuals on Friday, February 13, 2015 including the identity and contact information for the so-called “Pro Se Staff attorney” who sanctioned and endorsed Ross’s fabricated ruling against Radin on February 13, 2015, as Rooker-Feldman doctrine does not apply to state cases wherein court officers execute a fraud upon the court, as in Radin’s case; Rooker-Feldman doctrine assumes that there has been no fraud upon the court.

18. Any and all information in any form connected in any way including meta data and all linked files in connection with Radin’s complaints about Yeshiva University and its medical school, the Albert Einstein College of Medicine of Yeshiva University, and federal student loan fraud and hate crimes against Radin and fabricated rulings by federal Judge Robert P. Patterson Jr. to Federal Protective Service Officer Immanuel Mischa Wartofsky and Shayne Doyle including text messages, telephone calls, emails, reports, security assessments and the like.
19. Any and all information in any form connected in any way including meta data and all linked files in connection with Radin’s complaints about Yeshiva University and its medical school, the Albert Einstein College of Medicine of Yeshiva University, and federal student loan fraud and hate crimes against Radin and fabricated rulings by federal Judge Robert P. Patterson Jr. to Detective Ranaghan, New York City Police Department, 34th precinct including text messages, telephone calls, emails, reports, security assessments and the like.
20. Any and all information in any form connected in any way including meta data and all linked files in connection with Radin’s complaints about Yeshiva University and its medical school, the Albert Einstein College of Medicine of Yeshiva University, and federal student loan fraud and hate crimes against Radin and fabricated rulings by federal Judge Robert P. Patterson Jr. to AUSA Varuni Nelson in the Eastern district of New York, Department of Justice, including text messages, telephone calls, emails, reports, security assessments and the like.
21. Any and all video and audio recordings in the courtroom on August 10, 2016, and on August 26, 2016 that show Magistrate Freeman rigged the assignment wheel to steer this case to Magistrate Peck on August 10, 2016, and that show on August 26, 2016 Magistrate Peck rigged the assignment wheel to steer this case to Magistrate Pitman.
22. Any and all evidence that is arguably favorable to Lidya Maria Radin.
23. Any and all evidence that is arguably favorable to Lidya Maria Radin, and members of her group including but not limited to Dean Loren, Eric Richmond, Jayson Harley Burg, and Elvia Saravia.
24. Any notes of government agents including but not limited to statements that Defendant Radin was “disruptive in the courtroom” and “harassed an attorney and questioned him about the proceeding” on January 28, 2016, including the identity of the so-called law enforcement agent who made these statements and to whom these statements were made.

25. Any notes of government agents including but not limited to statements that Defendant Radin “ **refused to sit after being placed in handcuffs** ” on July 7, 2016 including the identity of the so-called law enforcement agent who made these statements and to whom these statements were made.
26. Any evidence or information that tends to negate Radin’s guilt or mitigate the offense, that that is favorable to Radin because it casts doubt on any essential element of any count in the charges, casts doubt on the admissibility of evidence that the government anticipates offering in its case-in-chief, casts doubt on the credibility or accuracy of any evidence or testimony that the government anticipates offering in its case-in-chief.
27. The name and address of every percipient witness in connection with the crimes of false arrest and false imprisonment inflicted on Lidya Maria Radin on January 28, 2016 and on July 7, 2016 whom the government does not intend to call at trial.
28. The arrest and conviction record of each prospective government witness.
29. Any and all evidence that any prospective government witness has any criminal charge pending against him or her, or is under investigation.
30. Any and all information “casting a shadow” on a government witness’s credibility.
31. Any and all evidence that any prospective government witness has made a statement inconsistent with or contradictory to any statement of another person.
32. Any and all evidence that a prospective government witness has engaged in crimes or bad acts in this or other cases, even though he or she has not been convicted for such conduct.
33. Any and all evidence that any prospective government witness has ever made any false statement to law enforcement authorities in this or any other case.
34. Any and all evidence that any prospective government witness has a tendency to lie or exaggerate his or her testimony.
35. Any and all evidence that a prospective government witness is biased or prejudiced against the defendant or has a motive to lie, exaggerate, falsify or distort his or her testimony.

Yours,

Lidya Maria Radin, sui juris

Lidya Maria Radin, Sui Juris

Dated: 21-February-2017
New York, New York

U.S. DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

docket no: 16-cr-528 (HBP)

UNITED STATES OF AMERICA,

Certificate of Service

Plaintiff,

v.

LIDYA MARIA RADIN

Defendant

I swear, under penalty of perjury, that I served Assistant United States Attorney Stephanie Lindsay Lake with “**DEFENDANT Lidya Radin’s REQUESTS FOR PRODUCTION OF DOCUMENTS AND/ OR THINGS, SET TWO (2)**” by U.S. mail on Tuesday, February 21, 2017, tracking number: *7016 2710 0000 2178 0619*

Lidya Maria Radin
2/21/2017

U.S. DISTRICT COURT SDNY

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Lidya Radin

40 Fremdenly

203. W. 107th St, #8A

New York, N.Y. 10025

* NOT For
the Pres se
Office *

Clerk of Court
500 Pearl Street
S.D. N.Y.
New York, New York 100

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